

THE HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

MARK AND BARBARA TOMINGAS,

Plaintiffs,

v.

CRESTBROOK INSURANCE COMPANY,

Defendant.

NO. 2:18-CV-00864-JLR

STIPULATED MOTION FOR  
ENTRY OF STAY

**Note on Motion Calendar:**  
August 10, 2018

The parties, by and through their respective attorneys of record, hereby move by stipulated motion for an Order staying this lawsuit for approximately 90 days until November 8, 2018. The parties are requesting this stay so as to allow for mediation to occur in the underlying lawsuit, *Fox v. Mark & Barbara Tomingas, et al.*, Yavapai County (Arizona) Superior Court cause number cv2017-80152.

Good cause exists for the parties' requested and agreed-upon 90-day stay. The 90-day stay will allow the Tomingases and the plaintiff in the underlying lawsuit time to mediate, and the parties believe that that mediation may result in no further need for litigation between the parties.

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STIPULATED MOTION FOR ENTRY OF  
STAY - 1  
(2:18-cv-00864-JLR)

**Ashbaugh Beal**  
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SEATTLE, WA 98104  
T. 206.386.5900 F. 206.344.7400

1 If the case is resolved, the parties will file dismissal paperwork with the Court. And if  
2 the mediation is not successful, the stay will expire on November 8, 2018, and the parties  
3 will request issuance of a revised Order Regarding Initial Disclosures, Joint Status Report,  
4 and Early Settlement.

5 As such, the parties believe that good cause exists for staying this lawsuit (and the  
6 deadlines in the Court's Order Regarding Initial Disclosures, Joint Status Report, and Early  
7 Settlement). This is the first request for stay in this matter.

8 The parties now file their Stipulated Motion and respectfully request that the Court  
9 GRANT it for good cause shown and enter the proposed Order filed herewith.

10 DATED this 10th day of August, 2018.

11 ASHBAUGH BEAL

12 By s/ Jocelyn J. Whiteley  
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Attorneys for Plaintiffs

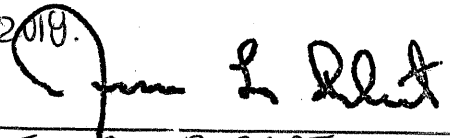
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Attorneys for Defendant

21 ORDER

22 It is so ordered.

23 Dated this 10th day of August, 2018.

24   
JAMES L. ROBART  
United States District Judge  
**Ashbaugh Beal**  
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SEATTLE, WA 98104  
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STIPULATED MOTION FOR ENTRY OF  
STAY - 2  
(2:18-cv-00864-JLR)

**CERTIFICATE OF SERVICE**

I hereby certify that on August 10, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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*Attorneys for Defendant*

The foregoing is true and correct to the best of my knowledge and belief.

Dated this 10th day of August, 2018, at Seattle, Washington.

s/ Teresa MacDonald  
Teresa MacDonald